IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI JACKSON DIVISION

OLIVIA Y., et al. PLAINTIFFS

v. CIVIL ACTION NO. 3:04CV251LN

PHIL BRYANT, as Governor of the State of Mississippi, et al.

DEFENDANTS

NOTICE OF FILING OF FINAL PERIOD 4 IMPLEMENTATION PLAN

Pursuant to Section I.D of the Modified Mississippi Settlement Agreement and Reform Plan (Dkt. No. 571) (the "Modified Settlement Agreement"), the parties agreed to develop an annual implementation plan setting forth the steps that must be taken during Implementation Period 4 in order to meet Implementation Period 4's interim benchmarks and make the progress necessary to achieve overall compliance with the Modified Settlement Agreement. The parties have negotiated and signed the Final Period 4 Implementation Plan, which supplements the parties' Initial Period 4 Implementation Plan (Dkt. No. 590), and which has this day been submitted electronically to the Court as Exhibit 1 attached hereto, and which is now incorporated into the Modified Settlement Agreement pursuant to Section I.E.

Respectfully submitted, this the 8th day of January, 2014.

/s/ Julia L. Davis

Marcia Robinson Lowry (MBN 43991 pro hac vice) Julia L. Davis (MBN 47310 pro hac vice) CHILDREN'S RIGHTS 330 Seventh Avenue, 4th Floor New York, New York 10001 Telephone: (212) 683-2210

W. Wayne Drinkwater, Jr. (MBN 6193) BRADLEY ARANT ROSE & WHITE LLP 188 East Capitol Street, Suite 450 Jackson, Mississippi 39201 Telephone: (601) 948-8000

Christian D. Carbone (MBN 43986 pro hac vice) John Piskora (MBN 44474 pro hac vice) LOEB & LOEB, LLP 345 Park Avenue New York, New York 10154 Telephone: (212) 407-4000

PLAINTIFFS' COUNSEL

/s/ Dewitt L. ("Rusty") Fortenberry, Jr. Dewitt L. ("Rusty") Fortenberry, Jr. (MSB #5435) Kenya Key Rachal (MSB # 99227) Ashley C. Tullos (MSB # 101839) BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, PC 4268 I-55 North Meadowbrook Office Park P.O. Box 14167 Jackson, Mississippi 39211 Telephone: (601) 351-2400

Harold Pizzetta, III, Esq. **Assistant Attorney General** General Civil Division Carroll Gartin Justice Building 430 High Street Jackson, Mississippi 39201

DEFENDANTS' COUNSEL

CERTIFICATE OF SERVICE

I, Julia L. Davis, do hereby certify that on January 8, 2014, I electronically filed a true and correct copy of the foregoing document with the Clerk of court using the ECF system which sent notification of such to counsel as follows:

> Dewitt L. ("Rusty") Fortenberry, Jr. (MSB #5435) Kenya Key Rachal (MSB # 99227) Ashley C. Tullos (MSB # 101839) BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, PC 4268 I-55 North Meadowbrook Office Park P.O. Box 14167 Jackson, Mississippi 39211

Telephone: (601) 351-2400 Facsimile: (601) 351-2424

Harold Pizzetta, III, Esq. **Assistant Attorney General** General Civil Division Carroll Gartin Justice Building 430 High Street Jackson, Mississippi 39201

SO CERTIFIED, this 8th day of January, 2014.

/s/ Julia L. Davis Julia L. Davis (MBN 47310 pro hac vice)